

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:)	CHAPTER 11
)	
BIG LOTS, INC., <i>et al.</i>)	CASE NO. 24-11967 (JKS)
)	
Debtors ¹)	(Jointly Administered)
)	

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that Timothy M. Reardon of the law firm of Brouse McDowell, LPA, 6550 Seville Drive, Suite B, Canfield, Ohio 44406, hereby enters an appearance as counsel for MBM Investments LLC (landlord for store #5205 located in Dansville, NY and store #4743 located in Collins, NY) in the above-captioned case. As such, the undersigned attorney and law firm hereby enter an appearance pursuant to Bankruptcy Rule 9010(b) and request copies of all notices and pleadings pursuant to Bankruptcy Rules 2002(a), (b) and (f). Unless filed and served via the Court's ECF system, all such notices should be addressed as follows:

Timothy M. Reardon, Esq.
BROUSE McDOWELL, LPA
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Canfield, Ohio 44406
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¹ The debtors and debtors-in-possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163) INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081..

PLEASE TAKE FURTHER NOTICE that this entry of appearance is not intended as, nor is it a consent to, jurisdiction of the Bankruptcy Court over MBM Investments LLC, specifically, but not limited to: (1) its right to have final orders in non-core matters entered only after de novo review by a district judge, (ii) its right to a trial by jury in any proceeding triable herein, or in any case, controversy or proceeding related hereto, (iii) its right to have the reference withdrawn by the District Court in any matter subject to mandatory, or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, set-offs, or recoupments to which MBM Investments LLC is or may be entitled under agreement, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments it expressly reserves.

Dated: September 16, 2024

Respectfully submitted,

/s/ Timothy M. Reardon

Timothy M. Reardon (0059631)

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Counsel for MBM Investments LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of September, 2024, a copy of the foregoing *Notice of Appearance and Request for Notices and Papers* was served to all parties of record via the Court's CM/ECF electronic mailing system.

/s/ Timothy M. Reardon
Timothy M. Reardon (0059631)
BROUSE McDOWELL, LPA
Counsel for MBM INVESTMENTS LLC

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